

Remarks

Claim 24 is pending. By this amendment, claim 24 has been amended. Reconsideration and allowance are respectfully requested in view of the above amendments and the following remarks. No new matter is believed added.

Claim 24 is rejected under 35 U.S.C. 103(a) over Peterson (US 4,020,762) in view of Stoffel et al. (Stoffel), and under 35 U.S.C. 103(a) over Peterson, Stoffel, and Witten et al. (Witten). Claim 24 is also rejected under the principles of *res judicata*.

The rejections under 35 U.S.C. 103(a) are defective because Peterson, Stoffel, and Witten, taken alone or in any combination, fail to teach or suggest each and every feature of the claims.

Claim 24 recites:

"A method for making a lithographic printing plate from an original containing continuous tones comprising the steps of:

screening said original to obtain screened data; and,
scan-wise exposing a lithographic printing plate precursor according to said screened data, said lithographic printing plate precursor having on a support a

surface capable of being differentiated in ink accepting and ink repellent areas upon said scan-wise exposure;

wherein said screening is a frequency modulation screening and **said lithographic printing plate precursor is heat-sensitive but not photosensitive** and contains a heat mode recording layer containing a substance capable of converting light into heat."

It should be noted that the following wavelengths generally apply for ultraviolet radiation (UV), visible light, and infrared radiation (IR):

1. Ultraviolet: 1 - 400 nm (e.g., 280-320 nm = UVB; 320 400 nm = UVA);
2. Visible light: 400 - 750 nm; and
3. Infrared: 750 - 1,000,000 nm (e.g., "near IR" = 750 - 3,000 nm).

It should also be noted that "heat-sensitive" refers to a sensitivity to IR (radiation) and that "photosensitive" refers to a sensitivity to the photons of visible light or UV light (or both).

Thus, the lithographic printing plate precursor set forth in claim 24 is heat-sensitive (i.e., sensitive to IR)

but not photosensitive (i.e., not sensitive to photons of visible and/or UV light).

Contrary to claim 24, Peterson discloses a plate that is both heat-sensitive to infrared (IR) radiation **and** photosensitive to ultraviolet (UV) radiation. The heat-sensitivity of Peterson is evidenced, for example, by the presence of carbon black (see, e.g., col. 1, line 38) which, as recognized by the Examiner (Final Office Action, section 3), is a heat-sensitive compound capable of converting light into heat. The photosensitivity of Peterson is evidenced, for example, by the presence of a diazo compound (see, e.g., col. 1, line 37), which is generally known to be UV-sensitive, and the fact that Peterson's plate, after image-wise IR-exposure, requires a post-exposure by UV (see, e.g., col. 1, line 51 to col. 2, line 5).

Stoffel and Witten fail to remedy the deficiencies of Peterson.

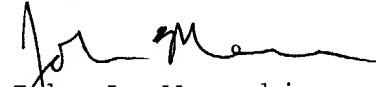
The rejection under the principles of **res judicata** is moot in view of the amendment to claim 24.

Accordingly, Applicants submit that claim 24 is allowable.

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe

that anything further is necessary, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



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